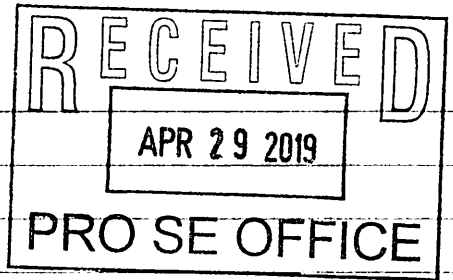


U.S. District Court  
Eastern New York



Charmaine Smith,  
Plaintiff,

Case No.:

**CV 19 - 2607**

v.

**DONNELLY, J.**

Ingemico Group,  
Defendant,

Jury Trial Demanded

**BLOOM, M.J.**

Civil Complaint

Parties

1. Charmaine Smith is the Pro Se Plaintiff and is a Citizen of Tennessee
2. Ingemico Group is the Defendant and is Incorporated in Delaware

Jurisdiction

1. Federal Question
2. Diversity: Amount in Controversy - \$5,000,000.00

Statement of Facts

Ingemico Group's Payment Processing Equipment and Software has enabled tracking,

manipulation, alteration, interference with, and/or potential cloning of personal information, availability/accessibility, spending limits, pricing, and sales discounts (covert, unauthorized, and/or denial of the benefit) through Point-of-Sale Transactions.

### Claims

1. Strict Liability
2. Product Liability - Design Defect
3. Consumer Protection Act
  - Title 18 U.S.C. § 2520
  - Wire, Oral, and Electronic Interception
4. Electronic Interception
  - Title 18 U.S.C. § 2520

### Demand for Relief

Monetary Award of \$5,000,000.00 and All Court, Attorney, Law Firm Advance/Settlement Funding, and/or Collection Costs, Fees, Expenses, and Interest be paid by the Defendant.

Date:

April 22, 2019

Respectfully,  
Charmane Smith, Plaintiff  
4952 Willow Road  
Memphis, TN 38117  
(901) 761-1678

Defendant:

1. Imgenico Group  
3025 Windward Plaza, Suite 600  
Alpharetta, GA 30005